



Revitalizing Auto Communities
Environmental Response Trust

March 19, 2012

U.S.EPA Region 5
Remediation and Reuse Branch
Land and Chemicals Division, LU-9J
77 West Jackson Blvd.
Chicago, IL 60604-3590
Attn: Mirtha Cápiro

RE: Sub-Slab and Indoor Air Sampling Work Plan Addendum
RACER Trust Moraine Facilities
Moraine, Ohio

Dear Ms. Cápiro:

The Revitalizing Auto Communities Environmental Response Trust (RACER Trust) is providing this Sub-Slab and Indoor Air Sampling Work Plan Addendum for the RACER Trust Moraine Facilities in Moraine, Ohio. The Sub-Slab and Indoor Air Sampling Work Plan (Work Plan), dated March 4, 2011, was prepared to provide details for the field investigation to collect sub-slab and indoor air samples from below and within residential and commercial structures in the Riverview Plat neighborhood located southwest of the former General Motors Corporation Moraine facilities. The Work Plan was conditionally approved by the United States Environmental Protection Agency (U.S. EPA) on February 8, 2011.

Since implementation of this Work Plan the U.S. EPA has finalized the Toxicological Review for both trichloroethene (TCE) and tetrachloroethene (PCE) resulting in the development of new inhalation toxicity values for both cancer and noncancer endpoints. These toxicity values have also been updated in U.S. EPA's Integrated Risk Information System (IRIS) and therefore, represent the most recent and up to date science as developed by U.S. EPA regarding the potential toxicity of these constituents.

Based on the changes to TCE and PCE toxicity values, the indoor air and sub-slab soil-gas Action Levels in Table 7 in the Work Plan have been updated. In particular, the indoor air Action Level for TCE decreased and is now based on a noncancer hazard of 1. The indoor air Action Level for PCE increased and is also based on a noncancer hazard of 1. For both chemicals, the indoor air Action Level at a 1×10^{-5} risk level was greater than the Action Level at a noncancer hazard of 1 and therefore, the more conservative value was used. Corresponding changes to the sub-slab soil-gas Action Levels are also presented in the amended Table 7.

If you have any questions, please contact me at (937) 751-8635.

Sincerely,

A handwritten signature in black ink, reading "Pamela L. Barnett". The signature is written in a cursive style with a large initial "P".

Pamela L. Barnett, PG
Assembly Region Cleanup Manager (DE, LA, MA, OH, PA, VA)
RACER Trust

cc: J. Stark, Ohio EPA

Attachments:

Table 7 - Residential and Non-Residential Action Levels for Sub-Slab Soil-Gas and Indoor Air, RACER Trust, Moraine, Ohio.



Table 7. Residential and Non-Residential Action Levels for Sub-Slab Soil-Gas and Indoor Air, RACER Trust, Moraine, Ohio.

Chemical Constituent	Residential Long-Term Action Level				Non-Residential Long-Term Action Level			
	Indoor Air ^(a)		Sub-Slab Soil-Gas ^(b)		Indoor Air ^(a)		Sub-Slab Soil-Gas ^(b)	
	(ug/m ³)	(ppbv)	(ug/m ³)	(ppbv)	(ug/m ³)	(ppbv)	(ug/m ³)	(ppbv)
1,1,1-Trichloroethane	5,210	955	52,100	9,550	21,900	4010	219,000	40,100
1,1-Dichloroethane	15.2	3.8	152	38	76.7	19.0	767	190
1,1-Dichloroethene	209	53	2,090	530	876	221	8,760	2,210
Cis-1,2-Dichloroethene	Not available	Not available	Not available	Not available	Not available	Not available	Not available	Not available
Tetrachloroethene ^(c)	42	6.2	420	62	180	27	1,800	270
Trans-1,2-Dichloroethene	62.6	15.79	626	157.9	263	66	2,630	660
Trichloroethene ^(d)	2.1	0.39	21	3.9	8.8	1.6	88	16
Vinyl Chloride	1.6	0.63	16	6.3	27.9	10.9	279	109

(a) Indoor Air Action Levels based on November 2011 U.S. EPA Regional Screening Levels for air at a cancer risk of 1×10^{-5} or noncancer hazard of 1, with exception of Tetrachloroethene, see footnote (c).

(b) The Sub-Slab Soil-Gas Action Levels are calculated from Indoor Air Action Levels using an attenuation factor of 0.1.

(c) Indoor Air Action Levels revised to reflect updated toxicity data finalized by U.S. EPA in February 2012.

(d) Indoor Air Action Levels revised to reflect updated toxicity data finalized by U.S. EPA in September 2011.

Trichloroethene and Tetrachloroethene toxicity values are based on U.S. EPA's Integrated Risk Information System Database (<http://www.epa.gov/iris/>).

Note: Calculation for action levels for ppbv are based on established action levels in ug/m³ utilizing the following equation: ppbv = ug/m³ x 24.45 (constant K) / molecular weight (MW).

ug/m³ - Micrograms per cubic meter.

ppbv - parts per billion by volume.